

Asbestos Notification Procedure

The Ames Laboratory Asbestos Notification Procedure outlines the procedural steps and responsibilities for ESH&A and Facility Services for filing asbestos notifications to the Iowa Department of Natural Resources.

Comments and questions regarding this policy and procedure should be directed to the contact person listed below:

Name: Dan Kayser
Environmental Specialist
Address: G40 TASF
Phone: 294-7923

SIGN-OFF RECORD:

Approved by: _____ Date: _____
Manager, ESH&A

Approved by: _____ Date: _____
Manager, Facility Services

Ames Laboratory		Procedure	10200.074
Office	Environment, Safety, Health & Assurance	Revision	0
Title	Asbestos Notification	Effective Date	03/12/03
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1.0 Revision/Review Log

The environmental specialist will review this document every three years.

Revision Number	Effective Date	Contact Person	Pages Affected	Description of Revision
0	03/12/03	D. Kayser	All	Initial Issue

2.0 Purpose and Scope

The purpose of this procedure is to ensure ESH&A and Facility Services personnel understand their responsibilities and the process for filing an Asbestos/Demolition Notification form to the Iowa Department of Natural Resources (IDNR).

3.0 Responsibility

3.1 ESH&A Manager:

The ESH&A Manager shall: **1)** Review Notifications for accuracy and completeness. **2)** Sign off on the Notification in section XVII as the Facility Operator. **3)** Make sure there are sufficient funds for appropriate training for the Environmental Specialist to stay current with the applicable regulations.

3.2 Facility Services:

Facility Services shall: **1)** Maintain a yearly log of all (planned & unplanned) asbestos and demolition projects for the Facility. **2)** Notify the Environmental Specialist of asbestos to be removed. **3)** Make sure that no asbestos or demolition projects take place before the authorized start date. **4)** Review completed Notifications and sign section XVI. **5)** Give the Environmental Specialist copies of the Facility's asbestos log at the end of the calendar year and subcontractor's Notifications. **6)** Notify the Environmental Specialist of any changes of planned or unplanned projects (section 4 & 5).

3.3 Environmental Specialist:

The Environmental Specialist shall: **1)** Fill-out Notifications and ensure their completeness (see Appendix) **2)** Submit Notifications to the IDNR as prescribed by 40 CFR 61. **3)** Notify Facility Services of the authorized start date for RCAM. **4)** Maintain and keep up-to-date with applicable regulations (40 CFR 61). **5)** Inform Facility Services and the ESH&A Manager of any regulatory changes. **6)** Maintain records of Notification.

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4.0 Nonscheduled Renovation Operation Procedure:

Nonscheduled renovation projects are maintenance type projects (i.e. pipe insulation removal due to water leak or floor tile that becomes a trip hazard). An annual Notification will be submitted for a calendar year for the Facility (i.e. all Ames Lab buildings). Written notification of removal amounts shall be estimated by Facility Services and given to the Environmental Specialist. The IDNR must be notified 10 working days prior to any asbestos removal.

- ✓ Facility Services will request annual Notifications for unplanned projects in writing and supply the annual estimated volumes (i.e. linear, cubic ft, square ft.) Start date will allow for the 10-day notification and end date shall be the last day of the current calendar year (e.g. 12/31/03).
- ✓ Facility Services will keep a log of unplanned asbestos projects. If the RCAM volumes exceed the Annual Notification's estimated limits Facility Services will notify the Environmental Specialists.
- ✓ The Environmental Specialist will revise the original Notification and submit the revision with new estimated RCAM volumes to the IDNR as needed.

5.0 Planned Renovation Operation Procedure:

Planned renovation projects are activities such as, tile removal projects. Once asbestos thresholds are met (40 CFR 61.145) the IDNR must be notified 10 working days prior to starting any asbestos removal and/or demolition activities. Planned projects are "stand alone" projects and only need revisions if the start or completion dates and/or quantities change for a project.

- ✓ Facility Services will keep a log of planned asbestos and/or demolition projects.
- ✓ Facility Services will notify the Environmental Specialist, in writing with the following information:
 - Building Name and room number.
 - Type of RACM to be removed.
 - Non-friable asbestos material that will not be removed (Cat I, Cat II).
 - Estimated volume.
 - Scheduled Start Date.
 - Scheduled Completion Date.
- ✓ The Environmental Specialist will review and enter data onto the Notifications.
- ✓ The Environmental Specialist will send completed Notifications with a memo (see attachment) and written correspondence from Facility Services and route paperwork to Facility Services and the ESH&A Manager.
- ✓ Facility Services and the ESH&A Manager will review and sign the Notification and route back to Environmental Specialist.
- ✓ The Environmental Specialist will attach a cover letter (see Appendix) to the Notification and make arrangements for delivery to the IDNR.
- ✓ The Environmental Specialist will notify Facility Services of the date in which they are authorized to start removal activities.

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- ✓ Facility Services will notify the Environmental Specialist of the actual start and completion dates as well as the actual quantity of asbestos removed.
- ✓ The Environmental Specialist will notify the IDNR, as needed, of the changes.

5.1 Contractor Removal Activities

In the event a contractor is utilized for the removal of RCAM, Facility Services will:

- 1) Provide contractor oversight.
- 2) Verify contractor has sent in a 10-day Notification.
- 3) Provide the Environmental Specialist with a copy of the contractor's 10-day Notification.

6.0 Definitions

Category I nonfriable asbestos-containing material (ACM) means asbestos –containing packagings, gaskets, resilient floor covering, and asphalt roofing products containing more than 1% asbestos.

Category II nonfriable ACM means any material, excluding Category I nonfriable ACM, containing more than 1% asbestos, that when dry, cannot be crumbled, pulverized, or reduced to powder by hand pressure.

Demolition means the wrecking or taking out of any load-supporting structural member of a facility.

Facility means any institutional, commercial, public, industrial, or residential structure, installation, or building.

Friable asbestos material means any material containing more than 1% asbestos that, when dry, can be crumbled, pulverized, or reduced to powder by hand pressure.

Nonfriable asbestos-containing material means any material containing more than 1% asbestos that, when dry, cannot be crumbled, pulverized, or reduced to powder by hand pressure.

Nonscheduled renovation operation means a renovation operation necessitated by the routine failure of equipment, which is expected to occur within a given period based on past operating experience, but for which an exact date cannot be predicted. *The IDNR's guidance is that maintenance related activities fall in this category.*

Planned renovation operation means a renovation operation, or a number of such operations, in which some RACM will be removed or stripped within a given period of time and that, can be predicted.

Regulated asbestos-containing material (RACM) means (a) Friable asbestos material, (b) Category I nonfriable ACM that has become friable, (c) Category I nonfriable material ACM that will be or has been subjected to sanding, grinding, cutting or abrading, or (d) Category II nonfriable ACM that has a high probability of becoming or has become crumbled, pulverized, or reduced to powder by the forces expected to act on the material in the course of demolition or renovation operations regulated by 40 CFR 61 Subpart M.

Renovation means altering a facility or one or more facility components in any way, including the stripping or removal of RACM from a facility component. Operations in which load-supporting structural members are wrecked or taken out are demolitions.

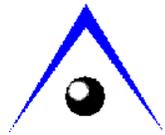
Resilient floor covering means asbestos –containing floor tile, and sheet vinyl floor covering containing more than 1% asbestos.

Working day means Monday through Friday and includes holidays that fall on any of the days Monday through Friday.

APPENDIX

ATTACHMENTS

- **Example ESH&A Memo**
- **Example Notification**
- **Example cover letter to IDNR**



AMES LABORATORY

Interoffice Communication

Environment, Safety, Health & Assurance

G40 TASF

PH: 515/294-2153

FAX: 515/294-2155

Date: MM/DD/YYYY

To: Mark Grootveld
Mike Vaclav
Tom Wessels
Dan Kayser

From: Dan Kayser
Environment, Safety, Health & Assurance (ESH&A)

Subject: Asbestos Notification

The attached Notification has been completed based on the information given by Facility Services (see attached correspondence). Please review for accuracy and completeness. If all information is complete and accurate sign where appropriate (i.e. Section XVI, Facility Services, section XVII 9, Tom Wessels or appointed alternate). After reviewing and signing please initial your name above and rout to the next person.

After the form is routed back to me I will arrange for the Notification to be delivered to the IDNR. I will then notify Facility Services of the authorized date that they may start asbestos removal activities.

EXAMPLE

Highlighted areas must be completed!!

NOTIFICATION OF DEMOLITION AND RENOVATION

Operator Project #	Date Received	Postmark	Notification #	
I. TYPE OF NOTIFICATION (O-Original R-Revised C-Cancelled):				
II. FACILITY INFORMATION (Identify owner, removal contractor, and other operator)				
OWNER NAME:				
Address:				
City:	State:	Zip:		
Contact:			Tel:	
REMOVAL CONTRACTOR:				
Address:				
City:	State:	Zip:		
Contact:			Tel:	
OTHER OPERATOR:				
Address:				
City:	State:	Zip:		
Contact:			Tel:	
III. TYPE OF OPERATION (D-Demo O-Ordered Demo R-Renovation E-Emer. Renovation):				
IV. IS ASBESTOS PRESENT? (Yes / No)				
V. FACILITY DESCRIPTION (Include building name, number and floor or room number)				
Bldg Name:				
Address:				
City:	State:	County:		
Site Location:				
Building Size:	# of Floors:	Age in Years:		
Present Use:		Prior Use:		
VI. PROCEDURE, INCLUDING ANALYTICAL METHOD, IF APPROPRIATE, USED TO DETECT THE PRESENCE OF ASBESTOS MATERIAL:				
VII. APPROXIMATE AMOUNT OF ASBESTOS, INCLUDING:				
1. Regulated ACM to be removed 2. Category I ACM Not Removed 3. Category II ACM Not Removed	RACM To Be Removed	Nonfriable Asbestos Material Not To Be Removed		Indicate Unit of Measurement Below UNIT
		Cat I	Cat II	
Pipes				Ln Ft: Ln m:
Surface Area				Sq Ft: Sq m:
Vol RACM Off Facility Component				Cu Ft: Cu m:
VIII. SCHEDULED DATES ASBESTOS REMOVAL (MM/DD/YY) Start:				Complete:
IX. SCHEDULED DATES DEMO/RENOVATION (MM/DD/YY) Start:				Complete

Continued on page two

X. DESCRIPTION OF PLANNED DEMOLITION OR RENOVATION WORK, AND METHOD(S) TO BE USED:		
XI. DESCRIPTION OF WORK PRACTICES AND ENGINEERING CONTROLS TO BE USED TO PREVENT EMISSIONS OF ASBESTOS AT THE DEMOLITION AND RENOVATION SITE:		
XII. WASTE TRANSPORTER #1		
Name:		
Address:		
City:	State:	Zip:
Contact Person:		Telephone:
WASTE TRANSPORTER #2		
Name:		
Address:		
City:	State:	Zip:
Contact Person:		Telephone:
XIII. WASTE DISPOSAL SITE		
Name:		
Location:		
City:	State:	Zip:
Telephone:		
XIV. IF DEMOLITION ORDERED BY A GOVERNMENT AGENCY, PLEASE IDENTIFY THE AGENCY BELOW:		
Name:	Title:	
Authority:		
Date of Order (MM/DD/YY):	Date Ordered to Begin (MM/DD/YY):	
XV. FOR EMERGENCY RENOVATIONS		
Date and Hour of Emergency (MM/DD/YY):		
Description of the Sudden, Unexpected Event:		
Explanation of how the event caused unsafe conditions or would cause equipment damage or an unreasonable financial burden:		
XVI. DESCRIPTION OF PROCEDURES TO BE FOLLOWED IN THE EVENT THAT UNEXPECTED ASBESTOS IS FOUND OR PREVIOUSLY NONFRIABLE ASBESTOS MATERIAL BECOMES CRUMBLLED, PULVERIZED, OR REDUCED TO POWDER.		
XVI. I CERTIFY THAT AN INDIVIDUAL TRAINED IN THE PROVISIONS OF THIS REGULATION (40 CFR PART 61, SUBPART M) WILL BE ON-SITE DURING THE DEMOLITION OR RENOVATION AND EVIDENCE THAT THE REQUIRED TRAINING HAS BEEN ACCOMPLISHED BY THIS PERSON WILL BE AVAILABLE FOR INSPECTION DURING NORMAL BUSINESS HOURS. (Required 1 year after promulgation)		
_____		_____
(Signature of Owner/Operator)		(Date)
XVII. I CERTIFY THAT THE ABOVE INFORMATION IS CORRECT		
_____		_____
(Signature of Owner/Operator)		(Date)

Figure 3. Notification of Demolition and Renovation

(Approved by the Office of Management and Budget under control number 2060-0101)

[55 FR 48419, Nov. 20, 1990; 56 FR 1669, Jan. 16, 1991; 58 FR 18014, Apr. 7, 1993]



AMES LABORATORY

CERTIFIED MAIL

MM/DD/YYYY

Mr. Dennis Thielen
Air Quality Bureau
State of Iowa Department of Natural Resources
7900 Hickman Rd, Suite 1
Urbandale, IA 50322

Dear Mr. Thielen:

Please find enclosed an annual notification for asbestos related maintenance projects for the remaining 2003 calendar year. The Laboratory anticipates that it will exceed the reportable amount sometime this year. Estimated amounts have been provided but a revision, if required, will be submitted within the first month of 2004 to reflect actual amounts removed.

Written notification for planned projects will be provided to you within the 10 working day requirement.

Sincerely,

Dan Kayser
Environmental Specialist

Enclosure

cc: T. Wessels
M. Grootveld

EXAMPLE